

Exhibit No. ~~46~~Date ~~1-9-09~~Bill No. ~~SB 51~~Exhibit No. ~~# 4~~Date ~~1-9-09~~Bill No. ~~SB 51~~

- **SB 51 – “the disclosure bill”**

Billings Clinic cannot support in its present form. This started out as a bill to address a specific concern raised by Sen. Weinberg to make sure physicians with an ownership interest in a health care facility disclose that interest when referring a patient for additional services.

We can support legislation that achieves that goal, and support the concept of transparency.

Billings Clinic supports transparency in reporting of quality (Hospital Compare, HealthGrades, others) and cost (newly launched MHA “Informed Patient” website, and Community Benefit Standards). We think we compare favorably, and want to continuously improve our services.

However, this bill has been high-jacked and diverted from that simple objective.

- **It creates a nightmare for healthcare organizations to implement (and serious confusion/distrust for patients) as it applies to a host of licensed health care professionals – 28, in all.**
- **It applies to employed providers, which we don't think is appropriate. Billings Clinic physicians have subjugated their interests to the greater good of the organization/community by giving up ownership and personal gain by assuming employment. To consider this employment as a conflict of interest is disingenuous.**
- **Also, the definition of referral is so broad and vague that it would apply virtually every time a licensed health professional hands a patient to someone else for additional services.**
- **Consider the scenario of a patient seen at Billings Clinic for evaluation and post-treatment care for a surgery**

complicated by diabetes. All of the dozen or so physicians, dieticians, diabetic educators, physical and occupational therapists, social workers, and so on and so on rendering care to this patient would be required to provide a "form of 100 word or less....on a separate piece of paper with at least 10 type" to have a patient sign, that states that they are employees of Billings Clinic. What purpose does that bureaucratic process address?

- We are in favor of "transparency", but this bill actually confuses, not clarifies.
- Billings Clinic opposes this legislation.

- **SB 26 – "economic credentialing"**

Billings Clinic has participated in the discussions during the interim review period, and commends the process to improve the outcome.

With the amendments proposed by MMA and MHA, Billings Clinic's concerns are addressed and it supports this amended bill as a good compromise.